



## SEXUAL HARASSMENT POLICY

Mindgate Solutions Private Limited; ("**Company**") with CIN: U72200MH2008PTC184354, having its registered office at 14th Floor, Damji Shamji Business Galleria, LBS Marg, Kanjurmarg (West), Mumbai - 400078, Maharashtra, India; is an equal opportunity employment company, without regard to race, caste, religion, colour, marital status, sex, age, nationality, disability of its staff or colleagues. The Company also believes that all employees of the Company have the right to be treated with dignity. The Company believes that Sexual Harassment at workplace is a grave offence. The Company holds the responsibility to identify and prevent Sexual Harassment and to develop a culture of "zero tolerance" for any form of Sexual Harassment at the Workplace. The Company will respond promptly to reports of Sexual Harassment and will take appropriate steps to discipline behavior that violates this Policy and if necessary, facilitate legal action. This Policy is applicable across the Company in all its Workplace.

Company has introduced POSH (Prevention of Sexual Harassment) policy and employees are given awareness through Online Training session and then employees are certified after successful completion of the training.

### Internal Complaints Committee

An Internal Complaints Committee ("**ICC**") must be constituted, in accordance with the provision of Section 4 of the Act, in every branch or office of the Company, to redress complaints of Sexual Harassment.

An ICC shall consist of:-

- (a) A presiding officer who shall be a woman employed at senior level;
- (b) Not less than 2 (two) Members from amongst the Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- (c) One Member from an NGO or association committed to the cause of women or person familiar with the issues relating to the Sexual Harassment.
- (d) At least one half of the total Members nominated shall be women. The Presiding Officer and Members shall hold office for a period not more than 3 years.

An order constituting the ICC shall be passed and shall be displayed at any conspicuous place of the Company.

### Confidentiality

Any and all persons entrusted with the duty to handle or deal with a Complaint, inquiry or any recommendation or action to be taken under the Act, Rules and this Anti-Sexual Harassment Policy shall not disclose the name, address, identity or any other particulars that can in any way reveal the identity of the Complainant and the witnesses or the Respondent to the public or media.

In case of any violation, the concerned person shall be liable for penalty in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, in such manner as may be prescribed by law.



## **Revision and Term of The Code and Anti-Harassment Policy**

This Anti-Harassment Policy shall be reviewed preferably once in three years, or as and when there are any amendments to the Act or Rules, whichever is earlier.

## **Contact Details of Key Persons**

Names of the members of the ICC, along with their contact details are provided in the order constituting the ICC.

The Company will periodically update the list of names and contact details of the members.

List of ICC Members Chennai:-

- Monika Bawa, Presiding Officer - [monika.bawa@mindgate.in](mailto:monika.bawa@mindgate.in)
- Ananthalakshmi D - [ananthalakshmi.d@mindgate.in](mailto:ananthalakshmi.d@mindgate.in)
- Atish Kumar - [atish.kumar@mindgate.in](mailto:atish.kumar@mindgate.in)
- Deepa T - [deepa.t@mindgate.in](mailto:deepa.t@mindgate.in)
- Dr. Anagha Sarpotdar - (External Member) - [anagha75.sarpotdar@gmail.com](mailto:anagha75.sarpotdar@gmail.com)

List of ICC Members Mumbai:-

- Monika Bawa, Presiding Officer - [monika.bawa@mindgate.in](mailto:monika.bawa@mindgate.in)
- Asawari Kulkarni - [asavari.kulkarni@mindgate.in](mailto:asavari.kulkarni@mindgate.in)
- Karthik RK - [karthik.rk@mindgate.in](mailto:karthik.rk@mindgate.in)
- Vishakha Shinde - [vishakha.s@mindgate.in](mailto:vishakha.s@mindgate.in)
- Dr. Anagha Sarpotdar - (External Member) - [anagha75.sarpotdar@gmail.com](mailto:anagha75.sarpotdar@gmail.com)

## **Conclusion**

The Committee will minute every one of its gatherings and procedures and submit yearly reports to the Director of the organization. The policy is subject to the revision from time to time to keep it up to date with changes in state acts and employments policies.

In conclusion, the Company reiterates its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect, and reiterates its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect